

Thorpe, Greg

To: ar40104@gsk.com
Subject: RE: Your High Road Partner/WHO?

ARJUN
RAJA RATNAM

I have had some serious complaints, regarding my DM taking disciplinary action against me for refusing to participate in obvious violations of company policy regarding malini, but not limited to speaker events/promotion etc.. These events continue with no response whatsoever back to me from Human Resources, who has been given most of the material evidence (not all).

HR has most recently refused to respond to my latest grievance and request to view my file within the required 10 days(response time). They have violated every published policy in regards to the matter at hand. Initially Carrie Rubright was handling this-most recently I wrote to Cynthia Kelly with no response. Is HR responsible to anyone for their own violations of published policy, if so to whom?? Please check this out, TAP Pharm. recently had to pay almost 1 billion dollars for similar conduct, yet this company will not even acknowledge my existence. My DM, Pat Keith has had full knowledge of the conduct, yet I was the one reprimanded by him for reporting it to him and refusing to participate. I suggest that someone inform me of the status of the matter. Cynthia Kelly now has the materials I sent in, and will get more if they wish to contact me per published policy. Thanks. After over two months with no response, and my reputation and employ at stake, I hope this can be referred to someone who has the ability to oversee HR. I have tried all I can to no avail.

Sincerely,

Greg Thorpe
1280 Painted Rocks Rd
Woodland Park Co. 80863
Sr. Exec. Sales Rep. (CNS)
719-687-7675

BE:
Terri
Schaffer
ext 32871
Jan 7-11
Pharma
Compliance

From: US Internal Communications
Sent: Tuesday, December 11, 2001 8:20 AM
Subject: Your High Road Partner

Dear Sales Colleagues:

The enclosed fact sheet, *Pharma Compliance: Your Partner on the High Road*, will introduce you to the newly created Pharma Compliance department. Pharma Compliance, which reports to me, was established in response to David Stout's "Taking the High Road" initiative, to make GlaxoSmithKline the leader for ethics and compliance in sales and marketing practices. Pharma Compliance is a resource to US Pharma to address potential policy compliance violations, and meet new requirements for independent audits of sample accountability under the Prescription Drug Marketing Act (PDMA).

Because of the heavy scrutiny the pharmaceutical industry faces, your management is determined to make GSK the leader for ethical promotional practices. That is the reason our Commercial Practices Policies regulate the use of promotional materials, activities with physicians such as advisory boards and speaker events, and prescription drug samples. These rules are your safe harbor -- they protect you and GSK. More important, it's the right thing to do.

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The Pharma Compliance team will work within US Pharma to provide an independent resource to conduct investigations of potential non-compliance with company policy, and random and for-cause audits of compliance with the PDMA. Your management will always be consulted before investigations are conducted. In addition, the team will send the sales representatives to be audited and their District Sales Manager a detailed information packet in advance of PDMA random audits. Global Internal Audit (GIA) will conduct regular audits in other policy areas.

In my role as Pharma Compliance Officer, I will also be working with other groups on processes and resources to support this effort. Please feel free to contact me with your questions, concerns or feedback. My phone number is (919) 483-9938. You can also send me e-mail through the internal e-mail system or the Web at ar40104@gsk.com.

As employees of the one of the world's largest pharmaceutical companies, it is more important than ever that we set the standard the industry strives to achieve. Our success in achieving this standard depends on you.

To Whom:
Re: Pharma Compliance Report 1/07/02

It is obvious to me prior to giving the information I am about to give that "retaliation" for informing certain individuals of severe violations of company policies has already begun. I have been given a "verbal warning" which is totally untrue, and does not follow company guidelines for disciplinary action. I have been ignored by Human Resources since July of 2001, regarding various requests for information. Most importantly they have even ignored letters from my attorney, and two other letters from me requesting appropriate action according to published guidelines and policies. I had to go all the way to the head of Pharma Compliance for any action. This matter has been ignored/covered up it seems by my District Manager, Pat Keith, Carrie Rubright and Cynthia Kelly in Human Resources, and Mike Bennett, Regional Vice President.

Regardless of what company policy may be, my letters to Human Resources and my previous complaints of misconduct have been quashed. My 23+ year career with this company has been trashed, and it is obvious that I can no longer work with my District Manager, or friends/counterparts just because I have come forward with the truth, which could save the reputation of GSK, and millions of dollars in fines. After investigating the TAP Pharm. issues and what we have here, possibly nationwide, I personally am extremely upset and angered at the indifference and pompous attitude of all of the above individuals, for ignoring my claims for over three months. The False Claims Act is no joking matter, nor a matter to be taken lightly, especially under the current attitudes regarding pharmaceutical companies in general.

This is not some minor violation of policy, the conduct I have attempted to report could result in severe legal and monetary penalties if left unchecked. I think that should be very evident and need no further explanation. I do not want to be the one responsible for a child's injury or worse because we PAID a physician, who wrote a book on ADHD, to tell others that Wellbutrin SR was a great drug for ADHD. Nor do I want to be responsible for paying a Nurse Practitioner to tell 200 others that Amerge is a great drug for Pediatric migraine. Further I will not take part in paying for an expensive lunch, and day at the SPA (\$350) for 25 physicians and physicians assistants, just for listening to what they already know about Wellbutrin SR for 1/2 hour.

I also believe expensive programs now approved and pending by Pat Keith, DM- re: Ski bus trips to Breckenridge, Dinner and tickets to Avalanche games with a "guest" for physicians is no more than "buying the business through bribery." Is this the "high road"?

We have been told that "public perception" is everything now. Well just imagine the call I received ten minutes ago from a physicians assistant, not a physician, ordering

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a 1) 65 minute deep tissue massage a 2) a 60 minute Colorado cleansing facial 3) a 30 minute foot reflexology and 4) a pedicure and French manicure. This would be after her "lunch at the Broadmoor" and 30 minute lecture by Brendan Montano, MD who flew in from Connecticut for several thousand dollars to talk about weight loss and the benefits of Wellbutrin SR!!!! I want to promote the benefits of my products, but this sickens even me. Can you imagine if the Wall Street Journal got a copy of this invitation, it would make the "dine and dash" look like a walk in the park.

All of the above has been approved by my District Manager Pat Keith, who disciplined ME for refusing to participate in a lecture by Paul Wender MD, who came here as he seemingly has all over the US to promote Wellbutrin SR for ADHD, as well as his own hook.

I am not the one to determine what disciplinary action should be taken for these repeated violations of clear company policies and FDA law, among others. It is clear to me what needs to be done, however. Further retaliation by Pat Keith or the others mentioned is, it seems to me inevitable. How could one work for a DM such as this after reporting his repeated proven misconduct?

The question for me is, what now? I have not taken the advice of my attorney, to become a whistleblower and go to Federal Court. I do not want a \$77 million whistleblower payment, like former TAP salesperson Douglas Durand received. I do want, however my reputation restored and those responsible for KNOWINGLY violating company policy or failing to report it held responsible. I would consider a severance/retirement plan *appropriate* for the losses I have suffered to date and will suffer if I am forced to work for Pat Keith or find other employ at my age. The inconsideration and violation of published policy by those in Human Resources have also contributed to the seemingly rapid demise of my career with this company for reporting wrongdoing. My wife and 4 children are my first and only concern after reporting these violations, and I would hope for a fair and logical treatment without resorting to any court actions. My previous complaints, gone unheeded are very clear in my attorneys letters to HR followed by my own letters.

In a letter dated 7/1/01 from David Stout, "Compliance with these policies is mandatory.....managers will be held accountable for ensuring all employees are trained on and comply with these policies. He further states in a letter dated 10/26/01, "all of you have completed your training on the new policies.....but to demonstrate our leadership, policies are not enough. We must ensure we are following the policies as well through compliance. It shows we "walk the talk" by having policies and checking to see that they are being followed....positive documentation of our commitment to the high road. *JP, Bob and I are fully behind a strong compliance program-it's good for patients, it's good for each of us, and it's good for our profitability and reputation.*

The most recent message from Arjun Rajaratnum among other things specifically states... These policies reflect how GSK sales representatives must conduct their

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business, and underscore the fact that GSK sales representatives are professionals, not *ENTERTAINERS* or *CATERERS*. That's why lavish meals, extravagant events and "Dine and Dash" are not acceptable. Your strict compliance with these policies shows that GSK is really on the HIGH ROAD.

Finally, I assume JP Garnier means what he says when he states, "Conducting our business with honesty and integrity is paramount. It is every employee's responsibility."

No one is above the laws established by the PDMA and FDA, or very clear company policy. This includes DM's who knowingly violate company policy, and RSD's, and HR personnel who ignore it when it is reported to them. I have not reported anything that I cannot document, nor anything trivial. I have put everything on the line, hoping for fair results. We shall see I suppose what the "high road" is and what "walk the talk" really means. Thanks for your time and efforts.

Sincerely,



Greg Thorpe

Sr. Executive Sales Rep.

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